

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF PENNSYLVANIA**

JEFFREY GLAUSER,	X	
	:	
Plaintiff,	:	Civil Action No.: 2:16-cv-03812-CDJ
	:	
v.	:	
	:	
IP LAW GROUP, P.C., d/b/a PATENT LAWYER:	:	
USA, DREW ALIA, and MARK GOLDSTEIN,	:	
	:	
Defendant.	:	
	:	
	X	

**PLAINTIFF’S PETITION FOR AWARD OF ATTORNEYS’ FEES AND COSTS**

Pursuant to this Court’s Order, dated May 2, 2018, and received on May 8, 2018, Plaintiff Jeffrey Glauser (“Plaintiff”), by and through his undersigned counsel, submits the following Petition for Award of Attorneys’ Fees and Costs.

In or about June 2017, the parties started engaging in settlement discussions via telephone conversations between Plaintiff’s counsel and Defendants’ counsel. After negotiations, the parties agreed to settlement this matter, with the first payment being due August 1, 2017. On multiple occasion, starting on or about July 10, 2017, Plaintiff’s counsel inquired via email and text message about the executed agreement and upcoming payment due date. After numerous attempts Plaintiff’s counsel advised Defendants’ counsel that he was going to move the Court to reinstate the case or enforcement the settlement. Plaintiff so moved the Court in September 2017 and on May 2, 2018, the Court awarded Plaintiff reasonable attorneys’ fees and costs arising out of Defendants Goldstein and IP Law Group, P.C. failure to execute the formal settlement agreement, requiring Plaintiff’s to move to enforce. A true and correct copy of the Settlement Agreement is attached hereto as **Exhibit A**.

Plaintiffs attorneys' fees associated with enforcing the Settlement Agreement included: 1) preparing and filing the Motion to Enforcement Settlement Agreement and that instant fee petition; 2) correspondence with Defense Counsel in reference to the Settlement Agreement and outstanding payment; and 3) correspondence and conferences with the Court regarding same. Plaintiff seeks an award of fees and costs representing the work of Matthew A. Lubner, Esquire and his staff, in enforcing the Settlement Agreement. Both the hourly rates and time expended in enforcing the Settlement Agreement are reasonable. A true and correct copy of the Declaration of Matthew A. Lubner, Esquire is attached hereto as **Exhibit B**. Accordingly, Plaintiff is entitled to recover from Defendants for the costs and fees associated with enforcing the Settlement Agreement and which evidence by the billing records filed under seal.

For the foregoing reasons, Plaintiff respectfully requests that the Court grant Plaintiff's Petition for Award of Attorneys' Fees and Costs and order Defendants Goldstein and IP Law Group, P.C. pay Plaintiff for the reasonable attorneys' fees and costs associated with enforcing the Settlement Agreement. Plaintiff requests that Defendants shall remit the full judgement (i.e., settlement amount, fees, costs, and interest) in three (3) equal installment payments with the first payment in fourteen (14) days of this order, the second payment thirty (30) days after the first payment, and final payment thirty (30) days after the second payment.

Respectfully Submitted,

McOMBER & McOMBER, P.C.  
*Attorneys for Plaintiff,*  
*Jeffrey Glauser*  
By: /s/ Matthew A. Lubner, Esq.

Dated: May 21, 2018